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January 14, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

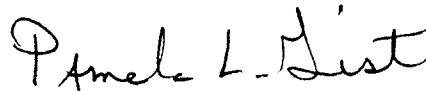
Re: **CC Docket 94-102**
Enhanced 911 Tier III Interim Report
North Carolina RSA 3 Cellular Telephone Company
d/b/a Carolina West Wireless

Dear Ms. Dortch:

On behalf of the above-referenced carrier there is transmitted herewith a narrative statement regarding the company's E-911 deployment and implementation status. The filer is a Tier III carrier submitting its Interim Report in accordance with the provisions of the Commission's *Order to Stay*, CC Docket 94-102, FCC 03-241 (rel. October 10, 2003), as well as the Commission's Order in *Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Order To Stay (rel. July 26, 2002) and the subsequent FCC Public Notice released June 30, 2003, DA 03-2113.

If questions arise with regard to this filing, please contact the undersigned.

Very truly yours,



Pamela L. Gist

**North Carolina RSA 3 Cellular Telephone Company
d/b/a Carolina West Wireless**

January 14, 2004

Interim Report of the Status of Enhanced 911 Phase II Compliance

Item I: Number of Phase I and Phase II Requests from PSAPs

- A. There are seven eligible PSAPs for W911 service within the service area of Carolina West: Alleghany County, NC; Ashe County, NC; Avery County, NC; Surry County, NC; Watauga County, NC; Wilkes County, NC and the City of Boone, NC.
- B. Carolina West responded to the requests from six PSAPs for Phase I and began service to the first of these PSAPs in June of 2000. All six PSAPs were in service by the end of December 2000. Carolina West will provide Phase I service to the seventh PSAP as soon as that PSAP is ready to receive the service.
- C. Carolina West is preparing to provide Phase II services to all seven PSAPs upon installation of a CDMA overlay and complementary Phase II delivery system. All of the PSAPs have agreed to Carolina West's implementation plan.

Item II: Carrier's Specific Technology Choice

Carolina West has elected to provide a handset-based solution, as confirmed in a notice filed with the FCC on May 23, 2003.

Item III: Status of Ordering and/or Installation of Necessary Network Equipment

Carolina West will deploy CDMA technology supplied by Nortel Networks, utilizing Nortel's XA Core Conversion / Code Division Multiple Access (CDMA) overlay technology. Carolina West has also procured the services of TeleCommunications Systems, Inc. ("TCS") to provide additional technical capabilities necessary to deploy a Phase II handset solution, including the Signal Soft location system. Following a protracted funding process pursued by Carolina West with the Rural Utilities Service, contracts have been entered into with Nortel and TCS and installation is now in progress.

Item IV: ALI-Capable Handset Availability

Carolina West began offering location capable CDMA handsets by September 1, 2003. Carolina West has not experienced supply problems in obtaining location capable CDMA handsets from manufacturers. However, on November 20, 2003, Carolina West submitted to the FCC a petition for extension of the handset activation schedule, proposing up to a nine-month extension, so that acceptance of CDMA handsets by Carolina West's customers will be permitted to comport with Carolina West's implementation of CDMA system technology.

Item V: Estimated Date on Which Phase II Service Will First Be Available

Carolina West's CDMA system is expected to be installed by April 1, 2004, subject to weather constraints. Coincidentally with installation, Phase II handset services of TCS will enable Carolina West to begin delivery of 911 caller location data to the PSAPs.

Item VI: Information on Whether the Carrier Is on Schedule to meet the Ultimate Implementation date of December 31, 2005

Carolina West continues to anticipate a problem meeting the FCC's requirement for 95% penetration of location capable handsets by December 31, 2005. Existing customers will be encouraged to change out their handsets for CDMA location capable units, but Carolina West cannot mandate that they do so. Carolina West continues to have a low rate of churn, and some of its original system customers from 1990 still use large bag phones and high power analog phones. Customers using existing TDMA technology phones will have to be persuaded to change out their customer owned sets to the new technology. Carolina West plans to request funds from the NC State Wireless 911 Fund to purchase the required replacements to meet the mandated FCC requirement of December 31, 2005.

AFFIDAVIT

County of Wilkes

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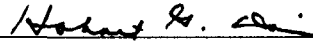
SS

State of North Carolina

I, Hobart G. Davis, having been first duly sworn, depose and state as follows:

1. I am President of North Carolina RSA 3 Cellular Telephone Company d/b/a Carolina West Wireless.
2. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

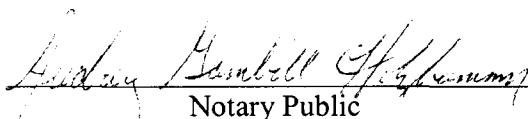
I declare under penalty of perjury that the foregoing is true and correct.



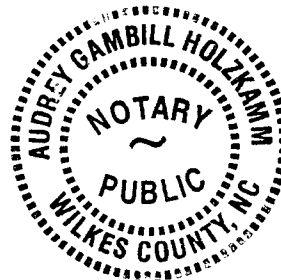
Hobart G. Davis
President
North Carolina RSA 3 Cellular Telephone
Company d/b/a Carolina West Wireless

Subscribed to and sworn to before me

this 8th day of January, 2004.


Notary Public

My commission expires: October 14, 2007



CERTIFICATE OF SERVICE

I, Daniel Ladmirault, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 14th day of January, 2004, sent by hand-delivery, a copy of the foregoing Enhanced 911 Tier III Interim Report of North Carolina RSA 3 Cellular Telephone Company d/b/a Carolina West Wireless to the following:

John Muleta, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
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Washington, D.C. 20554

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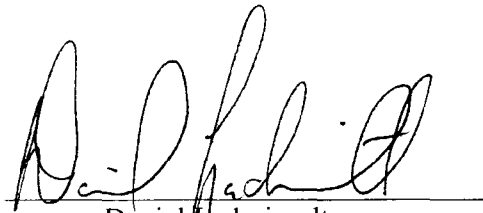
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Montpelier, VT 05620-6501



Daniel L. Admirault

*via hand-delivery